

Appln No. 09/991,081  
Amdt date January 18, 2006  
Reply to Office action of October 18, 2005

### REMARKS/ARGUMENTS

The above amendments and following remarks are made in response to the Office action of October, 18, 2005. The Specification has been amended to correct minor typographical errors. Claims 16-22, 27-29, 33-36, 39 and 40 are currently canceled. Claims 41-44 are currently added and are directed to the species elected in the previous Response, filed July 22, 2005. Claims 23 and 37 are currently amended. Claims 1-15, 23-26, 30-32, 37-38, and 41-44 are pending.

On pages 2-3 of the Office action, claims 1-4, 6-7, 10-14, and 30-32 are rejected as allegedly anticipated by Davis. Applicant respectfully traverses these rejections. To anticipate a claim, the reference must teach every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ.2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the...claim." *Richardson v. Suzuki Motor Co.*, 9 USPQ.2d 1913, 1920 (Fed. Cir. 1989). Therefore, all claim elements, and their limitations, must be found in the prior art reference to maintain a rejection based on 35 U.S.C. §102.

Regarding claims 1 and 30, Applicant respectfully submits that Davis does not disclose, among other limitations, "a key source for ...encrypting the cryptographic key" or "a transmitter for...decrypting the encrypted cryptographic key to recover the cryptographic key." The Examiner has pointed to FIGs. 4 and 8, and column 3, lines 21-45 as disclosing these elements, but Applicant cannot find any disclosure of encrypting or decrypting of a cryptographic key (e.g., session key/shared secret key/mail key) in either of the units 330 or 315 pointed out by the Examiner. As each and every limitation of these claims are not disclosed in Davis, Applicant respectfully requests that the rejections of independent claims 1 and 30, and their dependent claims 2-15 and 31-32 be withdrawn.

Further, Applicant cannot find, and the Examiner has not pointed out, any disclosure in the cited sections of Davis of:

"a key source [comprising] a first memory for storing the cryptographic key [e.g., session key/shared secret key/mail key], a second memory for storing an encryption key, or a key

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encryptor for encrypting the cryptographic key using the encryption key," as claimed in claims 2 and 11-13;

"a key decryptor for decrypting the encrypted cryptographic key using the decryption key," as claimed in claim 3; or

encryption and decryption of the cryptographic key, as claimed in claims 6-7.

Accordingly, Applicant respectfully submits that these claims are independently allowable, and requests that the rejections be withdrawn.

On page 3 of the Office action, claims 23-26 and 37-38 are rejected as allegedly anticipated by Komuro. Applicant respectfully traverses these rejections. Claims 23 and 37 recite, among other limitations, "a digital receiver for receiving the encrypted data in Digital Video Interface (DVI) format, receiving the encrypted cryptographic key over the I<sup>2</sup>C control bus, decrypting the encrypted cryptographic key to recover the cryptographic key, decrypting the encrypted data using the cryptographic key to generate digital data, and for transmitting the digital data in DVI format." As no disclosure of at least encrypted data in DVI format, receiving the key over an I<sup>2</sup>C control bus, or transmitting the digital data in DVI format is present in Komuro, Applicant respectfully submits that these claims are not anticipated. Applicant therefore respectfully requests that the rejections of claims 23-26 and 37-38 be withdrawn.

On pages 4 and 5 of the Office action, claim 5 is rejected as allegedly being obvious over Davis in light of 'Philips Semiconductors,' and claims 8-9 and 15 are rejected as allegedly being obvious over Davis in light of Saito. Applicant respectfully traverses these rejections. Three criteria must be met to establish a *prima facie* case of obviousness. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference. Second, there must be a reasonable expectation of success. Finally, the prior art reference, or combination of reference, must teach or suggest all of the claim limitations. (MPEP §2142).

Applicant respectfully submits that Davis does not teach or disclose at least "a key source for ...encrypting the cryptographic key" or "a transmitter for...decrypting the encrypted cryptographic key to recover the cryptographic key," as discussed above. Neither 'Philips

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Semiconductors' nor Saito cures this deficiency, nor do these references provide a motivation to combine with Davis to address this deficiency. Applicant therefore respectfully requests that the obviousness rejections of claims 5, 8-9, and 15 be withdrawn.

For the reasons discussed above, Applicant respectfully submits that the cited references fail to teach or suggest all of the limitations of Applicant's claims. Applicant therefore respectfully requests that these rejections be withdrawn.

Applicant also respectfully submits that claims 41-44 are allowable for similar reasons as discussed above, and further in light of the failure of the cited references to teach or suggest displaying an image corresponding to the decrypted DVI data on a digital display.

Respectfully submitted,  
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